

REMARKS

Claims 1, 3, 4 and 9-22 and 24-28 are now pending in the present application. Claims 1, 10, 13 and 18 are independent. Claims 1 and 10 are amended and claims 8 and 23 are canceled. No new matter is involved. Reconsideration of this application, as amended, is respectfully requested.

Claim Amendments

Claim 1 is amended to recite a combination of features, including the subject matter of claim 8, which is canceled. Support for the amendment is found throughout Applicants' originally filed disclosure.

Claim 10 has been amended to depend from claim 1. Support for the amendment is found throughout Applicant's originally filed application.

Entry of Claim Amendments

Applicants respectfully submit that it is proper to enter the claim amendments because they reduce and simplify the issues by canceling a number of claims and by including the subject matter of claim 8 in amended claim 1. As a result of these amendments, examination of this application will not require further consideration or search.

Rejections Under 35 U.S.C. § 103

Claims 1, 3, 4, 9, 11, 17, 20 and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,282,928 to Fukumoto et al. ("Fukumoto") in view of either European Patent document 0 485 700 (EPO '700), or U.S. Patent 5,983,520 to Kim et al. ("Kim") or WO 93/17169 (WIPO '160). This rejection is respectfully traversed.

During patent examination the PTO bears the initial burden of presenting a *prima facie* case of unpatentability. In re Oetiker, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444(Fed. Cir. 1992); In re Piasecki, 745 F.2d 1468, 1472, 223 USPQ 785, 788(Fed. Cir. 1984). This burden can be satisfied when the PTO presents evidence, by means of some teaching, suggestion or inference either in the applied prior art or generally available knowledge, that would have appeared to have suggested the claimed subject matter to a person of ordinary skill in the art or would have motivated a person of ordinary skill in the art to combine the applied references in the proposed manner to arrive at the claimed invention. See Carella v. Starlight Archery Pro Line Co., 804 F.2d 135, 140, 231 USPQ 644, 647 (Fed. Cir. 1986); Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 776 F.2d 281, 293, 227 USPQ 657, 664 (Fed. Cir. 1985), cert. denied, 475 U.S. 1017 (1986); In re Rinehart, 531 F.2d 1048, 1051-1052, 189 USPQ 143, 147 (CCPA 1976).

If the PTO fails to meet this burden, then the applicants is entitled to the patent. However, when a *prima facie* case is made, the burden shifts to the

applicant to come forward with evidence and/or argument supporting patentability. Patentability *vel non* is then determined on the entirety of the record, by a preponderance of evidence and weight of argument, In re Ochiai, cited above.

A prior art reference anticipates the subject matter of a claim when that reference discloses every feature of the claimed invention, either explicitly or inherently. In re Schreiber, 128 F.3d 1473, 1477, 44 USPQ2d 1429, 1431 (Fed. Cir. 1997) and Hazani v. Int'l Trade Comm'n, 126 F.3d 1473, 1477, 44 USPQ2d 1358, 1361 (Fed Cir. 1997). While, of course, it is possible that it is inherent in the operation of the prior art device that a particular element operates as theorized by the examiner, inherency may not be established by probabilities or possibilities. In re Oelrich, 666 F.2d 578, 581, 212 USPQ 323, 326 (CCPA 1981) and In re Rijckaert, 9 F.3d 1531, 1534, 28 USPQ2d 1955, 1957 (Fed. Cir. 1993).

What is alleged to be inherent must necessarily occur. The mere fact that something *may* result from a given set of circumstances is not sufficient. In re Oelrich, 212 USPQ 323, 326 (CCPA 1991). "Inherent anticipation requires that the missing descriptive material is 'necessarily present,' not merely probably or possibly present, in the prior art." Trintec Indus., Inc. v. Top-U.S.A. Corp., 295 F.3d 1292, 1295, 63 USPQ2d 1597, 1599 (Fed. Cir. 2002) (quoting In re Robertson, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950-51 (Fed. Cir. 1999)).

Because the rejection is based on 35 U.S.C. § 103, what is in issue in such a rejection is "the invention as a whole", not just a few features of the claimed invention. Under 35 U.S.C. § 103, "[a] patent may not be obtained . . . if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains." The determination under section 103 is whether the claimed invention as a whole would have been obvious to a person of ordinary skill in the art at the time the invention was made. See In re O'Farrell, 853 F.2d 894, 902, 7 USPQ2d 1673, 1680 (Fed. Cir. 1988). In determining obviousness, the Examiner must explain what the differences between the claimed invention and the prior art are and provide objective factual evidence to support a conclusion that it would be obvious to one of ordinary skill in the art to achieve the claimed invention, which includes those missing features.

In the second place, in rejecting claims under 35 U.S.C. § 103, it is incumbent on the Examiner to establish a factual basis to support the legal conclusion of obviousness. See, In re Fine, 837 F.2d 1071, 1073, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). In so doing, the examiner is expected to make the factual determinations set forth in Graham v. John Deere Co., 383 U.S. 1, 17, 148 USPQ 459, 467 (1966), and to provide a reason why one of ordinary skill in the pertinent art would have been led to modify the prior art or to combine prior art

references to arrive at the claimed invention. Such reason must stem from some teaching, suggestion or implication in the prior art as a whole or knowledge generally available to one having ordinary skill in the art. Uniroyal Inc. v. F-Wiley Corp., 837 F.2d 1044, 1051, 5 USPQ2d 1434, 1438 (Fed. Cir. 1988), cert. denied, 488 U.S. 825 (1988); Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 776 F.2d 281, 293, 227 USPQ 657, 664 (Fed. Cir. 1985), cert. denied, 475 U.S. 1017 (1986); ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984). These showings by the Examiner are an essential part of complying with the burden of presenting a *prima facie* case of obviousness. Note, In re Oetiker, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992). The mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the prior art suggested the desirability of the modification. In re Fritch, 972 F.2d 1260, 1266, 23 USPQ2d 1780, 1783-84 (Fed. Cir. 1992). To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be suggested or taught by the prior art. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1970). All words in a claim must be considered in judging the patentability of that claim against the prior art. In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970).

A showing of a suggestion, teaching, or motivation to combine the prior art references is an "essential evidentiary component of an obviousness holding." C.R.

Bard, Inc. v. M3 Sys. Inc., 157 F.3d 1340, 1352, 48 USPQ2d 1225, 1232(Fed. Cir. 1998). This showing must be clear and particular, and broad conclusory statements about the teaching of multiple references, standing alone, are not “evidence.” See In re Dembiczak, 175 F.3d 994 at 1000, 50 USPQ2d 1614 at 1617 (Fed. Cir. 1999).

Moreover, it is well settled that the Office Action must provide objective evidence of the basis used in a prior art rejection. A factual inquiry whether to modify a reference must be based on objective evidence of record, not merely conclusory statements of the Examiner. See, In re Lee, 277 F.3d 1338, 1343, 61 USPQ2d 1430, 1433 (Fed. Cir. 2002).

Claim 1 has been amended to include the subject matter of claim 8. The Office Action admits that claim 8 defines over the art applied in the rejection of claim 1 in the recitation of the plural helical grooves at an inner wall surface of the circulation duct. In an attempt to remedy this deficiency, the Office Action turns to EPO ‘389, which the Office Action contends discloses a circulation duct having a helical groove therein which retards the flow of water through the condenser.

Applicants respectfully disagree with this rejection for a number of reasons.

Firstly, EP ‘389 only discloses that the moisture laden air is caused to “leave the drum and to flow through a condensation arrangement which is generally formed by a sprinkle of cold water taken in from the water supply mains to create a cold barrier against which said moisture laden air is blown (col. 1, lines 27-32).”

Similar disclosure is found in col. 3, lines 13-26. EP '389 does not explicitly disclose a circulation duct with a plurality of grooves with helical configurations provided at an inner wall surface thereof for prolonging a heat exchange time period of the hot and humid air by reducing the flow speed of water along the inner walls of the circulation duct, as claimed. Nor does the Office Action provide a prima facie case that EP '389 provides such a disclosure inherently. In this regard, Applicants respectfully submit that, in order for a reference to inherently anticipate a claim or an element in the claim, the theory of inherency must be supported by facts and/or technical reasoning that reasonably support a determination that the allegedly inherent characteristic necessarily flows from the teachings of the prior art. Ex parte Levy, 17 USPQ2d 1461 (BPAI 1990) (emphasis added). Moreover, in order for prior art to anticipate a claim . . . , the inherency must be certain. Glaxo, Inc. v. Novopharm Ltd., (EDNC 1993) 830 F. Supp 871, 29 USPQ2d 1126; Ex parte Cyba (POBA 1966) 155 USPQ 756; Ex parte McQueen (POBA 1958) 123 USPQ 37. The fact that a prior art article may inherently have the characteristics of the claimed product is not sufficient. Ex parte Skinner (BPAI 1986) 2 USPQ2d 1788. Inherency must be a necessary result and not merely a possible result, i.e., inherency may not be established by probabilities or possibilities. In re Oelrich, 666 F.2d 578, 581, 212 USPQ 323, 326 (CCPA 1981) and In re Rijckaert, 9 F.3d 1531, 1534, 28 USPQ2d 1955, 1957 (Fed. Cir. 1993).

Neither the specification nor claims of EP '389 contains the terminology "helical" or "grooves" and Fig. 1 does not show anything that necessarily constitutes grooves or grooves of a helical configuration, in general, or on the inner wall surface of a conduit, as claimed.

The rejection is based solely on speculation that is not supported by any objective factual evidence in EP '389. It is well settled that a rejection under 35 U.S.C. § 103 cannot properly be based on speculation but must be based on objective factual evidence of record. See, In re Warner, 379 F.2d 1011, 1017, 154 USPQ 173, 178 (CCPA 1967), cert. denied, 389 U.S. 1057 (1968). See, also, In re GPAC, Inc., 35 USPQ2d 1116 at 1123 (Fed. Cir. 1995) and Ex parte Haymond, 41 USPQ2d 1217 at 1220 (Bd. Pat. App. & Int. 1996).

Finally, the Office Action asserts that to use a plurality of helical grooves involves the mere reversal, duplication or rearrangement of parts, citing MPEP § 2144.04.

Applicants respectfully submit that citing an MPEP Section does not provide proper motivation for one of ordinary skill in the art to modify Stone in view of a reference that is directed solving a problem not found in Stone and then modifying Stone despite the fact that Stone has no perceived problem that would be solved by helical grooves. Furthermore, Applicants have amended claim 8 and recited the function of the helically configured grooves, which function is simply not obvious in view of the applied art.

The Examiner relies upon MPEP §2144.04 as establishing a *per se* rule that duplication of parts is obvious. As stated by the Federal Circuit in *In re Ochiai*, 71 F.3d 1565, 1572, 37 USPQ2d 1127, 1133 (Fed. Cir. 1995), “reliance on *per se* rules of obviousness is legally incorrect and must cease.”

For a *prima facie* case of obviousness to be established, the teachings from the prior art itself must appear to have suggested the claimed subject matter to one of ordinary skill in the art. See *In re Rinehart*, 531 F.2d 1048, 1051, 189 USPQ 143, 147 (CCPA 1976). The mere fact that the prior art could be modified as proposed by the examiner is not sufficient to establish a *prima facie* case of obviousness. See *In re Fritch*, 972 F.2d 1260, 1266, 23 USPQ2d 1780, 1783 (Fed. Cir. 1992). The Examiner must explain why the prior art would have suggested to one of ordinary skill in the art the desirability of the modification. See *Fritch*, 972 F.2d at 1266, 23 USPQ2d at 1783-84.

Additionally, in response to this argument, the Examiner cites MPEP §2144.04 regarding duplication of parts. MPEP §2144.04 deals with the issue of duplication of parts by relying on “*In re Harza*, 124 USPQ 378 (CCPA 1960)” Applicant respectfully submits that reliance on this case is wholly inappropriate by terms of the USPTO’s own Board of Patent Appeals and Interferences decisions. In this regard, Applicants reproduce the following statements from the Board’s decision in *Ex parte Granneman*, 68 USPQ2d 1219 (BPAI 2003):

The examiner argues, in reliance upon *In re Harza*, 274 F.2d 669, 124 USPQ 378 (CCPA 1960), that an additional reactor in

Zinger's processing chamber would be a mere duplication of parts and, therefore, would have been obvious to one of ordinary skill in the art (answer, page 6).

The court in *Harza* stated that the only difference between the reference's structure for sealing concrete and that of Harza's claim 1 was that the reference's structure had only a single rib (i.e., arm) on each side of a web, whereas the claim required a plurality of such ribs. See *Harza*, 274 F.2d at 671, 124 USPQ at 380. The court stated that "[i]t is well settled that the mere duplication of parts has no patentable significance unless a new and unexpected result is produced, and we are of the opinion that such is not the case here." *Id.*

The examiner does not compare the facts in *Harza* with those in the present case and explain why, based upon this comparison, the legal conclusion in the present case should be the same as that in *Harza*. Instead, the examiner relies upon *Harza* as establishing a *per se* rule that duplication of parts is obvious. As stated by the Federal Circuit in *In re Ochiai*, 71 F.3d 1565, 1572, 37 USPQ2d 1127, 1133 (Fed. Cir. 1995), "reliance on *per se* rules of obviousness is legally incorrect and must cease."

[1] For a *prima facie* case of obviousness to be established, the teachings from the prior art itself must appear to have suggested the claimed subject matter to one of ordinary skill in the art. See *In re Rinehart*, 531 F.2d 1048, 1051, 189 USPQ 143, 147 (CCPA 1976). The mere fact that the prior art could be modified as proposed by the examiner is not sufficient to establish a *prima facie* case of obviousness. See *In re Fritch*, 972 F.2d 1260, 1266, 23 USPQ2d 1780, 1783 (Fed. Cir. 1992). The examiner must explain why the prior art would have suggested to one of ordinary skill in the art the desirability of the modification. See *Fritch*, 972 F.2d at 1266, 23 USPQ2d at 1783-84.

The examiner argues that one of ordinary skill in the art would have included an additional reactor in Zinger's processing chamber to permit simultaneous heat treatment of wafers in two boats and thereby increase the production capacity of the processing chamber (answer, pages 6-7). Zinger, however, uses multiple one-reactor processing chambers rather than multiple reactors within each processing chamber (figure 1). The examiner has not explained why

the Zinger reference itself would have fairly suggested, to one of ordinary skill in the art, the desirability of using multiple reactors within a processing chamber rather than using Zinger's multiple one-reactor processing chambers.

For the above reasons we conclude that the examiner has not established a *prima facie* case of obviousness of the appellants' claimed invention.¹

In other words, the Examiner's reliance on this section of the MPEP, which relies on this "In re Harza" case to establish a *prima facie* case of obviousness of the claimed invention, is fundamentally improper.

Moreover, even if the proposed modification of the alternative base reference combinations were obvious (which has not been shown to be obvious for reasons stated above), the modified version of the alternative base reference combinations have not been shown to result in, or render obvious, the claimed invention.

Accordingly, the Office Action does not make out a *prima facie* case of obviousness of the claimed invention.

Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

Claim 12 stands rejected under 35 U.S.C. §103(a) as unpatentable over the prior art applied in the rejection of claim 1 and further in view of U.S. Patent 5,277,210 to Kim. This rejection is respectfully traversed.

The alternative base reference combinations applied in this rejection do not render the claimed invention obvious, regardless of whether or not they are

modified by WIPO '169, which does not remedy the deficiencies in the aforementioned reference combination, which deficiencies are noted above in the traversal of the rejection of claim 1.

Kim is applied to disclose use of external fins on a cooling duct.

The Office Action that notes that Kim has cooling fins 101. However, these fins in Kim are not cooling fins in a clothes dryer to condense water from hot, humid air being recycled in the clothes dryer. Rather, Kim's cooling fins are for condensing water from hot humid air that is being exhausted from the dishwasher, and is not being recycled, to keep the pressure inside the dishwasher the same as the outside atmospheric pressure – see col. 1, lines 36-46. The Office Action has not pointed out the relevance of such a finned duct in a dishwasher to a duct in a condensing clothes dryer, especially one that has a heating element therein, as does that of Fukumoto.

It is not proper to just pick and choose elements from disparate type devices, as here, and demonstrate proper motivation to combine these features from such disparate devices, which are disparate for reasons pointed out above.

Applicants also respectfully submit that, even if it were obvious to provide fins on the circulation duct of the aforementioned reference combination used to reject claim 1 (and it is not), the resulting modified version of that reference combination would still not result in, or render obvious, the claimed invention because of the deficiencies in the base reference combination, as noted above.

Accordingly, the Office Action does not make out a *prima facie* case of obviousness of the claimed invention recited in claim 12.

Claim 10 stands rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent 3,216,126 to Brucken et al. ("Brucken") in view of either U.S. Patent 2,818,719 to Cline or U.S. Patent 3,402,576 to Krupsky. This rejection is respectfully traversed.

Because the rejection is based on 35 U.S.C. § 103, what is in issue in such a rejection is "the invention as a whole," not just a few features of the claimed invention. Under 35 U.S.C. § 103, "[a] patent may not be obtained . . . if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains." The determination under Section 103 is whether the claimed invention as a whole would have been obvious to a person of ordinary skill in the art at the time the invention was made. See In re O'Farrell, 853 F.2d 894, 902, 7 USPQ2d 1673, 1680 (Fed. Cir. 1988). In determining obviousness, the invention must be considered as a whole and the claims must be considered in their entirety. See Medtronic, Inc. v. Cardiac Pacemakers, Inc., 721 F.2d 1563, 1567, 220 USPQ 97, 101 (Fed. Cir. 1983).

Claim 10, as amended, depends from claim 1, which recites a combination of features neither disclosed nor suggested by the applied art. These features include, for example, a water supplying duct for supplying external water to an upper part of the inside of an inner wall of the at least one circulation duct to dehumidify the air in the at least one circulation duct primarily by flowing down the inner wall from said upper part and coming in direct contact with air received in the circulation duct, and wherein the one circulation duct has a plurality of grooves with helical configurations provided at an inner wall surface thereof for prolonging a heat exchange time period of the hot and humid air by reducing the flow speed of water along the inner walls of the circulation duct.

For this reason alone, this rejection of claim 10 does not make out a *prima facie* case of obviousness of the claimed invention.

Moreover, Brucken, the base reference, fails to disclose the recited (1) first and second tubs, and (3) an external fan disposed at an inlet area of the external air supplying duct. The Office Action admits that Brucken only discloses one tub. However, the Office Action does not admit that Brucken fails to disclose an external fan disposed at an inlet area of the external air supplying duct.

Brucken clearly discloses a combined washer-dryer with a single tub, and Brucken's fan (blower 62) is located well inside of the dryer. The Office Action fails to indicate how blower 62 is an external fan, as recited, located at an inlet area of the external air supply duct.

Brucken's external air supply duct is located inside of the dryer cabinet at grille 82, and the blower 62 is located deep inside of the dryer (not washer) of Brucken.

The Office Action tries to remedy the lack of a second tub disposed in a first tub, as recited, by turning to Cline, which is a combined clothes washer and dryer, and Krupsky, which is a combination clothes washer, clothes dryer, dishwasher, dry cleaner and Garment appearance-finishing machine.

The Office Action argues that it would be obvious to modify Brucken (which only discloses a single tub washer-dryer) to include the items associated with the washing machine as taught either by Cline or Krupsky, for the purpose of providing for a washing and a drying process in the same unit.

Applicants respectfully disagree, for a number of reasons.

Firstly, Brucken is specifically directed to providing a combined washer/dryer having a single tub 37 with gyration means to gyrate the axis of the single tub in one direction while rotating the tub in the opposite direction – see cols. 1 and 2 of Brucken. Brucken appears to work well without the need for a second tub, and the Office Action does not provide objective factual evidence explaining why one of ordinary skill in the art would take a perfectly good single tub washer dryer and redesign and rebuild it to include another tub, especially when Brucken does not need it to function properly. Just because double-tub washer dryers are available does not mean that one of ordinary skill in the art

would have incentive to modify a perfectly good single-tub washer dryer, especially where no objective factual evidence of the advantages of doing so is presented by the Office Action.

Merely that the prior art can be modified in the manner suggested by the Examiner does not render the modification obvious unless the prior art suggests the desirability of the modification. In re Fritch, 972 F.2d 1260, 1266, 23 USPQ2d 1780, 1783-4 (Fed. Cir. 1992). As Brucken does not even suggest the claimed double tub combined washer-dryer, this rejection must be based on speculation and/or impermissible hindsight.

Secondly, the Office Action does not explain how Brucken's gyration feature of its single tub would apply to a double tub or whether it would work, at all, in a double tub machine.

Furthermore, even if it were obvious to modify Brucken to provide a double-tub washer dryer (which it is not for reasons stated above), the resulting modified version of Brucken would still not have the claimed external air supplying duct feature and external fan feature.

The Office Action states that these features, i.e., the claimed external air supplying duct feature and external fan feature, would be obvious to provide to Brucken as "a mere extension/duplication of the teachings of Brucken (see MPEP 2144.04 REVERSAL, DUPLICATION OR REARRANGEMENT OF PARTS)."

Applicants respectfully are in complete disagreement with this aspect of the

rejection. This rejection completely fails to provide any objective factual evidence of any motivation to provide the claimed external air supplying duct and external fan features, and instead, improperly relies on a "*per se*" rule of unpatentability. As pointed out above, the Federal Circuit has stated, in *In re Ochiai*, 71 F.3d 1565, 1572, 37 USPQ2d 1127, 1133 (Fed. Cir. 1995), that "reliance on *per se* rules of obviousness is legally incorrect and must cease."

For a *prima facie* case of obviousness to be established, the teachings from the prior art itself must appear to have suggested the claimed subject matter to one of ordinary skill in the art. See *In re Rinehart*, 531 F.2d 1048, 1051, 189 USPQ 143, 147 (CCPA 1976). The mere fact that the prior art could be modified as proposed by the Examiner is not sufficient to establish a *prima facie* case of obviousness. See *In re Fritch*, 972 F.2d 1260, 1266, 23 USPQ2d 1780, 1783 (Fed. Cir. 1992). The Examiner must explain why the prior art would have suggested to one of ordinary skill in the art the desirability of the modification. See *Fritch*, 972 F.2d at 1266, 23 USPQ2d at 1783-84.

The Office Action does not provide such an explanation, nor does it present objective factual evidence to support such a speculative conclusion.

Accordingly, the Office Action has not made out a *prima facie* case that claim 10 is obvious in view of the applied references. Reconsideration and withdrawal of this rejection of claim 10 is respectfully requested.

Claim 23 stands rejected under 35 U.S.C. §103(a) as being unpatentable over the art applied in the rejection of claim 10 in view of Japan '857. This rejection is confusing because Japan '857 was not applied in the rejection of claims 8 and 22 and is only explained and applied in this rejection in the context of the rejection of claims 8 and 22. For this reason alone, it is improper.

Additionally, this rejection is moot because claim 23 has been canceled.

Allowed Subject Matter

Applicants acknowledge with appreciation the allowance of claims 13-16, 18 and 24-28.

Information Disclosure Statement

Applicants filed an Information Disclosure Statement on January 10, 2006, citing three references, one of which, WO 93/17169, has been cited and applied in the outstanding Office Action. Applicants respectfully request that the Examiner review this Information Disclosure Statement and provide Applicants with an initialed copy of the form PTO/SB/08a/b filed therewith, in the next Office Action.

CONCLUSION

All the stated grounds of rejection have been properly traversed and/or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently pending rejections and that they be withdrawn.

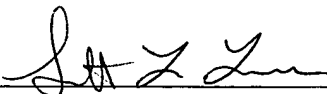
It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.


In the event there are any matters remaining in this application, the Examiner is invited to contact Robert J. Webster, Registration No. 46,472 at (703) 205-8076 in the Washington, D.C. area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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